

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF JAMES R. BEDELL IN SUPPORT OF SMARTMATIC'S
FOURTH MOTION TO COMPEL**

I, James R. Bedell, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am an attorney at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Peter Kent.

4. Attached as Exhibit 2 is a true and correct copy of excerpts from the transcript of the deposition of Peter Kent.

5. Attached as Exhibit 3 is a true and correct copy of the Expert Declaration of Benjamin R. Cotton.

6. Attached as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Benjamin R. Cotton.

7. Attached as Exhibit 5 is a true and correct copy of a letter from Maura Levine-Patton to Andrew Parker, dated October 3, 2023.

8. As of the date of this declaration, Smartmatic has not received the non-public reliance materials in conjunction with the Kent or Cotton reports.

9. Attached as Exhibit 6 is a true and correct copy of an email correspondence between counsel for Smartmatic and counsel for Defendants, dated August 8–16, 2024.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



James R. Bedell

Executed on August 20, 2024.